

Morgan Lewis

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Application granted. SO ORDERED.

New York, New York /s/ John G. Koeltl
December 29, 2020 John G. Koeltl, U.S.D.J.

December 28, 2020

Via ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Cedeno v. Argent Trust Company, et al.*
Case No. 1:20-cv-09987-JGK

Dear Judge Koeltl:

On behalf of Defendants Ryan Sasson, Daniel Blumkin, Ian Behar, Duke Enterprises LLC, Twist Financial LLC, Blaise Investments LLC, and Strategic Financial Solutions, LLC (collectively the “Strategic Financial Defendants”), we write to ask the Court to extend the deadline for the Strategic Financial Defendants to respond to Plaintiff Ramon Dejesus Cedeno’s Complaint (Dkt. No. 1) to February 15, 2021. We have consulted with Plaintiff’s counsel, who have consented to the requested extension. Good cause exists for the Strategic Financial Defendants’ request, as follows:

On November 27, 2020, Plaintiff filed his Complaint, in which he alleges that the Strategic Financial Defendants and co-defendant, Argent Trust Company, violated various provisions of the Employee Retirement Income Security Act of 1974, as amended (“ERISA”).

To date, Plaintiff has served some of the Strategic Financial Defendants, but not others. In particular, Plaintiff has not served the following four defendants: Ryan Sasson, Ian Behar, Duke Enterprises LLC, and Blaise Investments LLC. Of the Strategic Financial Defendants that have been served, their responses are due on various dates in the immediate future.

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Plaintiff's Complaint includes 142 paragraphs of allegations which focus on a stock purchase transaction involving an employee stock ownership plan ("ESOP") that closed on or about December 28, 2017. In order to give all of the Strategic Financial Defendants sufficient time to investigate Plaintiff's claims and prepare an appropriate pleading or motion, the Strategic Financial Defendants request an extension of their response deadline to February 15, 2021. That would place the Strategic Financial Defendants deadline for responding to the Complaint in line with co-defendant Argent Trust Company's deadline for responding to the Complaint, per this Court's Order (Dkt. No. 32).

The Strategic Financial Defendants have sought and received Plaintiff's consent to the relief requested herein. This is the Strategic Financial Defendants' first request to extend its deadline for responding to the Complaint and this request will not affect any other scheduled dates.

Accordingly, the Strategic Financial Defendants ask that the Court extend the deadline to respond to Plaintiff's Complaint to February 15, 2021.

Respectfully,

/s/ Jeremy P. Blumenfeld

Jeremy P. Blumenfeld

cc: All Counsel of Record (via ECF)
Antonia M. Moran (*pro hac vice* application to be filed)